



CBS

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HOWARD F. JAECKEL

VICE PRESIDENT AND ASSOCIATE GENERAL COUNSEL

**RE: FCC Reference Number: 1002
KTTV, Fort Worth, Texas, Facility ID No. 23422
File No. BFRCT- 20050812ABR
First Round Channel Election Application
Docket No. 03-15**

Dear Ms. Sawez:

August 15, 2005

Reference is made to the FCC Form 383 (First Round Conflict Decision) filed on behalf of Station KTVT-DT Fort Worth, Texas, by CBS Stations Group of Texas, LP ("CBS"), its licensee.

KTVT operates on NTSC (analog) channel 11 and digital (DTV) Channel 19. In the First Round of the FCC's DTV channel election process, CBS elected its NTSC Channel 11 for the post-transition digital operations of KTVT.

By letter dated June 7, 2005, the FCC notified CBS that the proposed digital operation of KTVT on its elected Channel 11 would result in 11.6 % new interference to the proposed digital operation of KXII-DT Sherman, Texas, on its elected NTSC Channel 12, and 0.3 % new interference to the proposed digital operation of KWTX-DT Waco, Texas, on its elected NTSC Channel 10. At the same time, Gray Television Licensee, Inc. ("Gray"), licensee of KXII and KWTX, was notified by the FCC that the digital operation of KWTX on its elected NTSC Channel 10 would result in 0.5 % new interference to KTVT's proposed digital operation on its elected NTSC Channel 11.

The parties have entered a Negotiated Conflict Resolution Agreement (the "Agreement"), involving mutual acceptance of the above interference, which is being submitted to the Commission herewith. In addition, we are submitting an Engineering Statement prepared by Joseph M. Davis, P.E., which provides certain information requested in connection with interference acceptance agreements¹ (and which Commission staff has informally advised us should be furnished when such an agreement involves the acceptance of additional interference of over two percent).

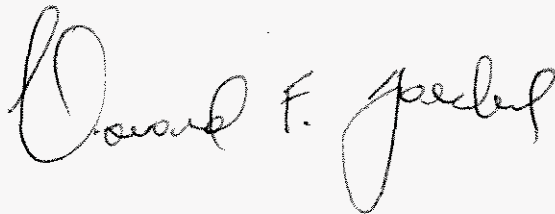
¹ See, *Public Notice, DTV Channel Election: First Round Conflict Decision Extension and Guidelines for Interference Conflict Analysis*, DA 05-2233 (released August 2, 2005).

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As shown in the Engineering Statement, the Agreement serves the public interest because (1) it would allow KTVT to remain on a high-VHF channel, which is considered ideal for digital broadcasting, and on which it has long operated; (2) it would free up KTVT's current in-core DTV channel (Channel 19) for subsequent election or future use by new entrants; (3) there would be no interference within KXII's community of license or its DMA; (4) eighteen other digital television stations will provide service to the KXII interference area, including KTVT, which is affiliated with the CBS Television Network, as is KXII; and (5) after the digital conversion, the population served without inference by KXII's Channel 12 operation would be 114.4 percent greater than the population reached interference-free by its analog operation, even with KTVT broadcasting digitally on Channel 11.

Please let us know if further information would be helpful.

Sincerely,

A handwritten signature in cursive script, appearing to read "David F. Jacobs".

Nazifa Sawez
Federal Communications Commission
Room 2-A726
445 12th Street, S.W.
Washington, D.C. 20554